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*Verified petitions for permission to practice forthcoming
*Counsel for Plaintiff Craig Farah, Personal Representative
of the Estate of Nicholas Farah*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CRAIG FARAH, Personal
Representative of the ESTATE OF
NICHOLAS FARAH,

Plaintiff,

vs.

No. 2:20-cv-00604

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT; RICHARD
NEWMAN; SAMUEL MENDOZA;
AARON MOSELY; JEREMY
STEWART; CHRISTY SNAPP;
GABRIEL VILLANUEVA; KIM SOFFE;
and COLLIN PETRIELIUS,

Defendants.

**PLAINTIFF'S UNOPPOSED
MOTION FOR LEAVE TO FILE
INSTANTER VERIFIED PETITION
FOR DAVID OWENS AND MOTION
FOR EXTENSION OF TIME TO
FILE VERIFIED PETITION FOR
SARAH GRADY**

Now comes Plaintiff, Craig Farah, as Personal Representative of the Estate of Nicholas Farah, by and through his undersigned counsel, and respectfully requests that this Court permit Plaintiff's attorney, David Owens, leave to file his verified petition for permission to practice in this case *instante*. Plaintiff further

1 requests an extension of time to June 11 to file Sarah Grady's verified petition for
2 permission to practice in this case. In support of his requests, Plaintiff states as
3 follows:

4 1. Plaintiff has filed a 42 U.S.C. § 1983 lawsuit against the Las Vegas
5 Metropolitan Police Department and others over the death of his son, Nicholas
6 Farah, at the Clark County Detention Center (CCDC) on March 31, 2019. Dkt. 1.

7 2. Plaintiff is represented in this lawsuit by David Owens and Sarah
8 Grady at Loevy & Loevy, a civil rights law firm headquartered in Chicago. They are
9 not licensed to practice law in the State of Nevada, but are working with the
10 undersigned as Designated Resident Nevada Counsel for Plaintiff.

11 3. This Court previously ordered counsel to file verified petitions by May
12 16, 2020. Dkt. 3. Unfortunately, because of difficulties due to the COVID-19
13 pandemic, and uncertainty regarding counsel's ability to obtain the required
14 notarization of the verified petitions while under stay-at-home orders, counsel was
15 unable to file their petitions by the May 16 deadline.

16 4. Counsel has since resolved these issues, and been able to begin
17 completing the verified petitions. Accordingly, Plaintiff has attached to this motion
18 the required verified petition for permission to practice in this case for David
19 Owens. Ex. A.

20 5. Unfortunately, Sarah Grady's verified petition is not yet complete, as
21 she is still waiting to receive a certificate of good standing from the State of New
22 York, one of the two states where she is licensed to practice law. Accordingly,
23 Plaintiff respectfully requests a brief extension of time, up to and including June 11,
24 to provide Ms. Grady's verified petition.

25 6. Counsel for Plaintiff has conferred with counsel for the Defendants
26 (excepting Defendant Collin Petrieliuss who has not yet been served). Counsel for
27 Defendants report that they do not oppose Plaintiff's request.
28

WHEREFORE, Plaintiff respectfully requests that this Court permit Plaintiff's attorney, David Owens, leave to file his verified petition for permission to practice in this case *instanter*, and to permit Plaintiff's attorney, Sarah Grady, a brief extension of time to June 11 to file her verified petition for permission to practice.

Dated: May 28, 2020

Respectfully submitted,

CRAIG FARAH

By: /s/ Luke A Busby
Designated Resident Nevada Counsel
for Plaintiff

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CERTIFICATE OF SERVICE

I, Luke A. Busby, an attorney, hereby certify that on May 27, 2020, I filed the foregoing via CM/ECF, which effected service on all counsel of record. I further certify that I will ensure that Defendant Collin Petrieliuss receives a copy of the foregoing at the time that he is served with notice of this lawsuit pursuant to Rule 4 of the Federal Rules of Civil Procedure.

/s/ Luke A Busby
Designated Resident Nevada Counsel
for Plaintiff